

*Re: [unclear]*

# Columbia Gas Transmission<sup>LLC</sup>

**A NiSource Company**  
1700 MacCorkle Avenue S.E.  
Charleston, WV 25314

September 15, 2010

*Director*  
EPA Region III  
Air Protection Division  
1650 Arch Street  
Philadelphia, Pennsylvania 19103

**RE: 40 CFR 63 Subpart ZZZZ Initial Notification of Applicability**

Dear: Sir/Madam

Pursuant to 40 CFR 63.9, enclosed with this letter are Initial Notifications of Applicability of 40 CFR 63 Subpart ZZZZ to named emission units at Buff Lick and Kenova Natural Gas Compressor Stations. Should you have any questions or require additional information, please contact me at 304-357-2196 ([jmorgan@nisource.com](mailto:jmorgan@nisource.com)).

Sincerely,



Joe Morgan  
EH&S Coordinator

Enclosure

RECEIVED  
SEP 17 2010  
3AP20

cc:



**Initial Notification Report**

Applicable Rule: 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Initial notification is being made in accordance with §63.9(b).

*Note: Initial notification reports are due not later than 120 calendar days after the effective date of the relevant standard, or within 120 calendar days after the source becomes subject to the relevant standard. Sources may also use the application for approval of construction or reconstruction under §63.5(d) to fulfill the initial notification requirement.*

*If you are a new or reconstructed major source, you must also include information required under 63.5(d) and 63.9(b)(5) - the Application for Approval of Construction or Reconstruction. You may use the Application for Approval of Construction and Reconstruction as your initial notification. (§63.5(d)(1)(ii)).*

**SECTION I  
GENERAL INFORMATION**

A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)		Facility I.D. Number (OPTIONAL)	
R30-NGGP-2007-09900014		099-00014	
Responsible Official's Name/Title			
Ralph Hall, Manager of Operations			
Street Address			
1700 MacCorkle Ave., S.E.			
City	State	ZIP Code	
Charleston	WV	25314	
Facility Name (if different from Responsible Official's Name)			
Kenova Compressor Station			
Facility Street Address (If different than Responsible Official's Street Address)			
2000 Big Sandy River Rd			
Facility Local Contact Name		Title	Phone (OPTIONAL)
Joe Morgan		EH&S Coordinator	304-357-2196
City	State	ZIP Code	
Kenova	West Virginia	25530	

B. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date (mm/dd/yy)
40 CFR 63, Subpart ZZZZ (RICE MACT)	12/31/10

## SECTION II SOURCE DESCRIPTION

A. Briefly describe the nature, size, design, and method of operation of the source.  
(§63.9(b)(2)(iv))

Kenova Compressor Station is part of Columbia's natural gas transmission system. The station operates natural gas compressors that pressurize incoming gas prior to routing the gas to downstream pipelines. The station also operates auxiliary equipment, such as emergency generators. The station is designed to operate 24 hours per day, 365 days per year.

B. Briefly describe the types of emission points within the affected source and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

### Types of Emission Points

Four of the natural gas compressors at the station are driven by spark-ignited reciprocating internal combustion engines (Emission Unit IDs 02005, 02006, 02007, and 02008) that are subject to the emission reduction requirements in 40 CFR 63, Subpart ZZZZ, Table 2d. These engines are natural gas-fired, are rated at 1100 horsepower each, and are 4-stroke rich-burn design. All four engines are Ingersoll-Rand Model 410 KVG-1.

### Types of HAPs Emitted

The primary HAP emitted by the engines is formaldehyde. Other HAPs include acetaldehyde, acrolein, benzene, toluene, ethyl benzene, and xylene. These compounds are byproducts of natural gas combustion.

C. Check the box that applies: (§63.9(b)(2)(v))

- ☐ My facility is a major source of Hazardous Air Pollutants (HAPs)  
☒ My facility is an area source of HAPs

NOTE: A major source is a facility that emits or has the potential to emit greater than 10 tons per year of any one HAP or 25 tons per year of multiple HAPs. All other sources are area sources.

## SECTION III

**CERTIFICATION** (Note: Certification is Optional – not required under §63.9(b). You may edit the text in this section as deemed appropriate)

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Ralph Hall	Manager of Operations	September 14, 2010
Signature of Responsible Official		
<i>Ralph Hall</i>		

Responsible official is defined under §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is owned by the Federal, State, city, or county government; or a ranking military officer if the plant is located on a military installation.

## Initial Notification Report

**Applicable Rule:** 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Initial notification is being made in accordance with §63.9(b).

*Note: Initial notification reports are due not later than 120 calendar days after the effective date of the relevant standard, or within 120 calendar days after the source becomes subject to the relevant standard. Sources may also use the application for approval of construction or reconstruction under §63.5(d) to fulfill the initial notification requirement.*

*If you are a new or reconstructed major source, you must also include information required under 63.5(d) and 63.9(b)(5) - the Application for Approval of Construction or Reconstruction. You may use the Application for Approval of Construction and Reconstruction as your initial notification. (§63.5(d)(1)(ii)).*

### SECTION I GENERAL INFORMATION

A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)		Facility I.D. Number (OPTIONAL)	
None (grandfathered minor source)		None	
Responsible Official's Name/Title			
Ralph Hall, Manager of Operations			
Street Address			
1700 MacCorkle Ave., S.E.			
City	State	ZIP Code	
Charleston	WV	25314	
Facility Name (if different from Responsible Official's Name)			
Buff Lick Compressor Station			
Facility Street Address (If different than Responsible Official's Street Address)			
County Route 81 (Kelly's Creek Rd, ~2 miles north of intersection with U.S. Hwy 60)			
Facility Local Contact Name		Title	Phone (OPTIONAL)
Joe Morgan		EH&S Coordinator	304-357-2196
City	State	ZIP Code	
Cedar Grove	West Virginia	25039	

B. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date (mm/dd/yy)
40 CFR 63, Subpart ZZZZ (RICE MACT)	12/31/10

## SECTION II SOURCE DESCRIPTION

A. Briefly describe the nature, size, design, and method of operation of the source.  
(§63.9(b)(2)(iv))

Buff Lick Compressor Station is part of Columbia's natural gas transmission system. The station operates a natural gas compressor that pressurizes incoming gas prior to routing the gas to a downstream pipeline. The station is designed to operate 24 hours per day, 365 days per year.

B. Briefly describe the types of emission points within the affected source and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

### Types of Emission Points

The natural gas compressor at the station is driven by a spark-ignited reciprocating internal combustion engine that is subject to the emission reduction requirements in 40 CFR 63, Subpart ZZZZ, Table 2d. The engine is natural gas-fired, is rated at 600 horsepower each, and is 4-stroke rich-burn design. The engine is a Waukesha Model L7042G.

### Types of HAPs Emitted

The primary HAP emitted by the engine is formaldehyde. Other HAPs include acetaldehyde, acrolein, benzene, toluene, ethyl benzene, and xylene. These compounds are byproducts of natural gas combustion.

C. Check the box that applies: (§63.9(b)(2)(v))

- ☐ My facility is a major source of Hazardous Air Pollutants (HAPs)  
☒ My facility is an area source of HAPs

NOTE: A major source is a facility that emits or has the potential to emit greater than 10 tons per year of any one HAP or 25 tons per year of multiple HAPs. All other sources are area sources.

## SECTION III

**CERTIFICATION** (Note: Certification is Optional – not required under §63.9(b). You may edit the text in this section as deemed appropriate)

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Ralph Hall	Manager of Operations	September 14, 2010
Signature of Responsible Official		
<i>Ralph Hall</i>		

Responsible official is defined under §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is owned by the Federal, State, city, or county government; or a ranking military officer if the plant is located on a military installation.